

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

Timothy J. Donohue,)	
)	
Plaintiff,)	
)	Case No. 4:22-CV-04044-KES
vs.)	
)	
Arthur J. Gallagher & Co., a Delaware)	SUPPLEMENTAL
Corporation; and Bob Jacobsen)	DECLARATION
)	OF HAL A. SHILLINGSTAD
Defendants.)	
)	

I, Hal Shillingstad, declare as follows:

1. I am an attorney with the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I represent Defendants Arthur J. Gallagher & Co. (“AJG”) and Bob Jacobsen in the above-referenced matter.

2. I make this Declaration in Opposition to Plaintiff’s Motion for Partial Summary Judgment filed on July 7, 2022 and in Support of Defendants’ Motion for Partial Summary Judgment filed on July 28, 2022.

3. Attached hereto as Exhibit A is a true and accurate copy of excerpts from the transcript of the deposition of Plaintiff Timothy J. Donohue, taken September 14, 2022. Portions of the excerpts not relevant to the facts at issue are redacted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 16, 2022

/s/Hal A. Shillingstad
Hal Shillingstad